

EXHIBIT B

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Subject: Johnson et al v. Zuffa, LLC et al; Case No.: 2:21-cv-01189-RFB-BNW
Date: Wednesday, April 23, 2025 8:03:21 PM

Counsel,

We write in response to your requests relayed during the parties' April 9, 2025 meet and confer and in your letter dated April 11, 2025 in connection with the non-parties' April 2, 2025 responses and objections to Plaintiffs' subpoenas. We provide Defendants' responses below. As we have previously disclosed, unless otherwise specified below, Zuffa, TKO, and Endeavor consolidate the below responses for efficiency's sake and for the sole purpose of responding to Plaintiffs' individual subpoenas and questions regarding ESI sources associated with individual subpoena recipients who have worked for Zuffa, TKO, and/or Endeavor. The agreement to consolidate Zuffa/TKO/Endeavor's responses regarding these individuals and their enterprise devices and communication channels is not a waiver or limitation of any right or previously-lodged objection to the discovery requests made to Zuffa, TKO, or Endeavor, and does not otherwise impact TKO's and Endeavor's separate corporate forms.

- Plaintiffs requested that Zuffa clarify its position regarding whether it has possession, custody, or control over certain individuals' electronic devices and communications therein.
 - Zuffa confirms it does not have access to, or possession, custody, and control over, individuals' personal social media accounts and/or communications made from personal devices via non-enterprise communication channels, *e.g.*, text messages sent from a personal device. Zuffa acknowledges that it has access to and possession, custody, or control over enterprise devices (to the extent they exist for particular custodians), *e.g.*, company cell phones, and Zuffa will review and produce any relevant documents from such sources. Zuffa also acknowledges that it has access to and possession, custody, or control over enterprise communication channels, *e.g.*, company emails or company Teams messages (to the extent they exist for particular custodians), and Zuffa will review and produce any relevant documents from such sources.
- Plaintiffs requested a list of the digital devices used by the subpoenaed individuals for work purposes, and whether they had access and/or used enterprise communication channels installed by Defendants.
 - Defendants have identified the following corporate devices for the non-parties. For each Defendant-issued device listed below, Defendants installed Microsoft Teams. Defendants do not have enterprise solutions to manage or back up other non-enterprise communication channels, such as SMS, Facebook, WhatsApp, or Instagram. Any personal devices with potentially relevant information of current employees are subject to

preservation requirements under operative legal hold(s), regardless of whether the information exists on a company-issued or personal device. Non-employees have been advised of their preservation obligations, and counsel for the individuals is in the process of confirming the full scope of potentially relevant ESI sources that are not in Defendants' possession, custody, or control. To the extent that we learn of any potentially relevant ESI sources in the possession, custody, or control of individuals that is not in Zuffa's possession, custody, or control, we will continue to make all good-faith efforts to collect and produce documents from such sources, subject to the parties' and individuals subpoena recipients' previously-lodged objections.

Non-Party	User Status	Current Enterprise Device Type	Current Enterprise Mobile Device & Model	Other Current Enterprise Devices	Other Devices with Potentially Relevant Information	Non-Enterprise Source(s) with Potentially Relevant Data Identified
Andrew Schleimer	ACTIVE	Apple Desktop	iPhone 16 Plus	Apple Laptop	Prior cell phone	cell phone, computer hard drive
Ariel Emanuel	ACTIVE	Apple Desktop	iPhone 16 Pro 1TB	iPad Pro (12.9-inch) (6th generation)	Prior cell phone	
Craig Borsari	ACTIVE	Windows Desktop	iPhone 16 Pro Max		Prior cell phone	cell phone
Dana White	ACTIVE	Windows Laptop	iPhone 16 Pro		Prior cell phone	
Grant Norris-Jones	ACTIVE	Windows Laptop	iPhone 16 Pro Max		Prior cell phone	
Hunter Campbell	ACTIVE	Apple Desktop	iPhone 15 Pro		Prior cell phone	cell phone, computer hard drive
Ike Epstein	ACTIVE	Windows Desktop	iPhone 16 Pro		Prior cell phone	cell phone, paper files, computer hard drive
Jason Lublin	ACTIVE	Windows Desktop	iPhone 16 Pro Max	iPad Pro 13-inch (2024) 2TB		
Marc Ratner	ACTIVE	Windows Desktop	iPhone 16 Pro Max		Prior cell phone	

Mark Shapiro	ACTIVE	Apple Desktop	iPhone 16 Pro 1TB	iPad Pro 12.9 4th Gen 256GB	Prior cell phone	
Mick Maynard	ACTIVE	Apple Laptop	None		Prior cell phone	cell phone
Patrick Whitesell	ACTIVE	Windows Desktop	iPhone 16 Pro Max 1TB	iPad Pro 12.9-inch (6th Generation)		
Peter Dropick	ACTIVE	Windows Desktop	iPhone 16 Pro Max		Prior cell phone	cell phone
Sean Shelby	ACTIVE	Apple Laptop	None		Prior cell phone	cell phone
Seth Krauss	ACTIVE	Apple Laptop	iPhone 15 Pro Max 512TB	iPad Pro 12.9 4th Gen 256GB		
Tracy Long	ACTIVE	Windows Desktop	None		Prior cell phone	cell phone

Best,
Robert

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